

### **Remarks and Arguments**

Claims 1-6, 8-21, 23-29, 31-37, 39-46, 48-61 and 63-69 have been presented for examination. Claims 1, 10, 25, 32, 41, 50 and 65 have been amended. Claims 8, 23, 39, 48, 63, 67 and 68 has been canceled.

Claim 67 has been objected to under 37 C.F.R. §1.75(c) for failing to limit the subject matter of its base claim. In response, claim 67 has been canceled. since the subject matter of claim 67 was incorporated into base claim 65, claim 67 has been canceled. The failure to cancel claim 67 in the previous response was an oversight.

Claims 1-6, 8-21, 23-29, 31-37, 39-46, 48-61 and 63-69 have been rejected under 35 U.S.C. §103(a) as obvious over U.S. Patent No. 6,067,545 (Wolff, previously cited) in view of U.S. Patent No. 6,799,208 (Sankaranarayan.) The examiner comments that the Wolff reference discloses the elements recited in the claims, but that it does not disclose selecting a service configuration policy and using that service configuration policy to generate commands that implement a predetermined service quality. However, the examiner asserts that the Sankaranarayan reference discloses a system for managing resources based on user requests that also includes a policy server that can be used by a resource manager for allocating and configuring resources. The examiner claims that it would have been obvious to combine the teachings of Wolff and Sankaranarayan to allow the Wolff system better and more intelligent control over resource allocations.

The Wolff patent has been discussed in detail in the response filed on June 10, 2005. As asserted there, Wolff discloses both client load and resource balancing, which is accomplished by appropriately modifying a configuration database and then duplicating the configuration database in all of the server nodes in the system. See, for example Wolff, column 8, lines 9-23. The examiner analogizes the configuration databases in each of the servers to the elements recited in the claims. However, in the present invention, the configuration elements use resource configuration API commands that are provided with the resources to configure the resources. This allows the configuration elements to work with existing resources. See the instant specification page 9, line 22 to page 10, line 18 and Figure 3. The examiner points to a common API referenced at Wolff, column 56, lines 1-6 as disclosing these resource configuration API

commands. However, in the quoted section Wolff is discussing an embodiment in which a client computer can directly access storage resources thereby bypassing the storage server. In order to allow clients running different operating system to access the same storage, a protocol converter is used to convert all of the file system commands used by the various clients to a common API which is then used to access the storage system. It is clear that the API commands discussed in Wolff are used to access a storage system not to configure it. Configuration is performed by modifying the configuration database as discussed above.

The Sankaranarayan reference discloses a resource manager that controls access to resources based on a conflict resolution policy which is implemented via a policy manager. The reference is not concerned with configuring resources in a computer system. Thus, if its teachings are combined with those of Wolff, as suggested by the examiner, it cannot change the basic teachings of Wolff, that is, configuring a system by replicating configuration databases. It might, for example, suggest that the Wolff configuration system be driven by policy considerations. However, the combination would not teach or suggest calling API configuration commands that exist for a resource in order to configure that resource.

The claims have been amended to specifically point out this difference. Claim 1 is illustrative. It has been amended to include the limitations of claim 8 and now recites "A method for configuring multiple resources in a system, wherein each resource has at least one API command that can be called to configure that resource ... associating multiple elements with the resources, each element calling selected API commands for one resource in order to configure that resource in a manner different from other elements ... for each element receiving at least one of the communicated commands, calling at least one API command for its associated resource in order to configure its associated resource as requested by the received command." As discussed above, neither the Wolff reference nor the Wolff reference as modified by the Sankaranarayan reference teaches or suggests configuration elements that use resource API commands to configure the resources. Thus, amended claim 1 patentably distinguishes over the cited reference combination. Claim 8 has been canceled.

Claims 2-6 and 9 are dependent, either directly or indirectly on amended claim 1 and incorporate the limitations thereof. Therefore, they distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 1.

Independent claims 10, 25, 32, 41, 50 and 65 have been amended to contain limitations that parallel those in amended claim 1. In particular, the limitations of claim 23 have been incorporated into claim 10, the limitations of claim 39 have been incorporated into claim 32, the limitations of claim 48 have been incorporated into claim 41, the limitations of claim 63 have been incorporated into claim 50 and the limitations of claim 68 have been incorporated into claim 63. Consequently claims 10, 25, 32, 41, 50 and 65 also patentably distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 1.

Claims 11-21 and 24 are dependent, either directly or indirectly on amended claim 10 and incorporate the limitations thereof. Therefore, they distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 10.

Claims 26-29 and 31 are dependent, either directly or indirectly on amended claim 25 and incorporate the limitations thereof. Therefore, they distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 25.

Claims 33-37 and 40 are dependent, either directly or indirectly on amended claim 32 and incorporate the limitations thereof. Therefore, they distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 32.

Claims 42-46 and 49 are dependent, either directly or indirectly on amended claim 41 and incorporate the limitations thereof. Therefore, they distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 41.

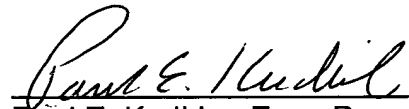
Claims 51-61 and 64 are dependent, either directly or indirectly on amended claim 50 and incorporate the limitations thereof. Therefore, they distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 50.

Claims 66 and 69 are dependent, either directly or indirectly on amended claim 65 and incorporate the limitations thereof. Therefore, they distinguish over the cited Wolff and Sankaranarayan references in the same manner as amended claim 65.

In light of the forgoing amendments and remarks, this application is now believed in condition for allowance and a notice of allowance is earnestly solicited. If the

examiner has any further questions regarding this amendment, he is invited to call applicants' attorney at the number listed below. The examiner is hereby authorized to charge any fees or direct any payment under 37 C.F.R. §§1.17, 1.16 to Deposit Account number 02-3038.

Respectfully submitted



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